

Chief Judge Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS-WASHINGTON,

Plaintiff,

v.

UNITED STATES CUSTOMS AND
BORDER PROTECTION, *et al.*,

Defendants.

Case No. 2:20-cv-0217-RSM

**STIPULATED MOTION AND
PROPOSED AND ORDER ON
BRIEFING SCHEDULE**

NOTE ON MOTION CALENDAR:
May 15, 2020

Pursuant to Local Civil Rule 7(d)(1), Plaintiff Council on American-Islamic Relations-Washington (CAIR-WA) and Defendants U.S. Customs and Border Protection and U.S. Department of Homeland Security request that the Court enter the dispositive briefing schedule outlined below.

The parties continue to agree that, at this time, the initial disclosure requirements of Rule 26(a)(1) and the requirements of Rule 26(f), requiring the parties to prepare a discovery plan, are not appropriate, as the litigation is unlikely to lead to trial, and most likely, not discovery. *See*

Dkt. 10. CAIR-WA continues to reserve the right to request discovery should evidence of bad faith or other grounds of discovery emerge. *See id.*

The parties respectfully request that the Court enter an order with the following briefing schedule:

June 12, 2020: Defendants will produce a Vaughn index or declaration addressing their basis for withholding documents responsive to Plaintiff's Freedom of Information Act request.

July 3, 2020: Defendants' deadline to file their motion for summary judgment

July 24, 2020: Plaintiff's deadline to file a response and cross motion for summary judgment.¹

August 14, 2020: Defendants' deadline to file their response to Plaintiff's cross motion for summary judgment and reply in support of motion for summary judgment

August 21, 2020: Plaintiff's deadline to file a reply in support of its motion for summary judgment.

Respectfully submitted on this 15th day of May, 2020.

s/ Matt Adams

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s/ Aaron Korthuis

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¹ Plaintiff also reserves the right to seek additional relief, such as a more detailed Vaughn index.

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ORDER

Pursuant to the Parties' stipulated motion, the Court hereby ORDERS the following briefing schedule:

June 12, 2020: Defendants will produce a Vaughn index or declaration addressing their basis for withholding documents responsive to Plaintiff's Freedom of Information Act request.

July 3, 2020: Defendants' deadline to file their motion for summary judgment

July 24, 2020: Plaintiff's deadline to file a response and cross motion for summary judgment.

August 14, 2020: Defendants' deadline to file their response to Plaintiff's cross motion for summary judgment and reply in support of motion for summary judgment

August 21, 2020: Plaintiff's deadline to file a reply in support of its motion for summary judgment.

IT IS SO ORDERED.

Dated this 22nd day of May, 2020.



RICARDO S. MARTINEZ
United States Chief District Judge

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

DATED this 15th day of May, 2020.

s/ Aaron Korthuis

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